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13
14 **UNITED STATES DISTRICT COURT**
15 **DISTRICT OF NEVADA**

16 ALLSTATE INSURANCE COMPANY,
17 ALLSTATE PROPERTY & CASUALTY
INSURANCE COMPANY, ALLSTATE
18 INDEMNITY COMPANY, and ALLSTATE
FIRE & CASUALTY INSURANCE
19 COMPANY,

20 Plaintiffs,

21 v.

22 RUSSELL J. SHAH, MD, DIPTI R. SHAH,
MD, RUSSELL J. SHAH, MD, LTD., DIPTI
23 R. SHAH, MD, LTD., and RADAR
MEDICAL GROUP, LLP dba UNIVERSITY
24 URGENT CARE, DOES 1-100, and ROES
101-200,

25 Defendants.

26
27 AND RELATED CLAIMS
28

CASE NO. 2:15-cv-01786-APG-CWH

**STIPULATION TO INCLUDE NAQVI
INJURY LAW INTO THE STIPULATED
CONFIDENTIALITY AND PROTECTIVE
ORDER (ECF NO. 39) FOR THE
DISCLOSURE OF DOCUMENTS
PURSUANT TO F.R.C.P. 45 SUBPOENA**

**STIPULATION TO INCLUDE LAW FIRM INTO THE STIPULATED CONFIDENTIALITY AND
PROTECTIVE ORDER (ECF NO. 39)**

1 Plaintiffs/Counter-defendants ALLSTATE INSURANCE COMPANY, ALLSTATE
2 PROPERTY & CASUALTY INSURANCE COMPANY, ALLSTATE INDEMNITY COMPANY,
3 and ALLSTATE FIRE & CASUALTY COMPANY (collectively referred to as the "Plaintiffs"), and
4 NAQVI INJURY LAW (non-party herein after referred to as "NIL") hereby stipulate and agree as
5 follows:

6 1. Plaintiffs served NIL with a subpoena pursuant to F.R.C.P. 45 for the production of
7 documents regarding communications and payments made by and between Law Firm and the
8 Defendants during NIL's representation of certain clients in personal injury claims for which Plaintiffs
9 paid on settlement on behalf of Plaintiffs' insureds.

10 2. NIL provided a written objection to the Rule 45 subpoena.

11 3. NIL is aware that Plaintiffs have subpoenaed several law firms seeking the same type
12 of information pursuant to Rule 45 in this case, as well as a companion sister-lawsuit *Allstate v.*
13 *Belsky, et. al. Case No. 2:15-cv-00065-MMD-CWH* ("*Belsky*").

14 4. NIL understands that this Court presides over both the instant matter as well as the
15 *Belsky* matter, and that this Court has ruled consistently in both these cases and ordered other law
16 firms to produce the same type of documents request of NIL.

17 5. A stipulated confidentiality and protective order in this case entered between Plaintiffs
18 and Defendants for the disclosure of confidential, sensitive or other protected information was
19 approved by this Court on May 20, 2016. (ECF No. 39).

20 6. NIL was not a party to the stipulated confidentiality and protective order. (ECF No.
21 39).

22 7. In ordering compliance with Plaintiffs' subpoenas to other law firms, this Court also
23 ordered that the confidentiality and protective order (ECF No. 39) be applied to those law firms.

24 8. In accordance with this Court's prior rulings both in this action and in the *Belsky*
25 matter, the parties hereby stipulate and agree that the protections and scope articulated in the
26 Stipulated Confidentiality and Protective Order approved by this Court on May 20, 2016. (ECF No.
27 39) be extended in their entirety to cover NIL in its compliance with Plaintiffs' subpoena.

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1 9. NIL will produce all documents responsive to the subpoena within ten (10) days of
2 approval and entry of this Order by the Court.

3 IT IS SO STIPULATED.

4 Dated: 1/11/19

Dated: January 11, 2019

5 McCORMICK, BARSTOW, SHEPPARD,
6 WAYTE & CARRUTH LLP

NAQVI INJURY LAW

7 By: 

By: /s/ Elizabeth E. Coleman

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702-553-1000

11
12 **ORDER**

13 IT IS SO ORDERED.

14 DATED this 14 day of January, 2019.

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18 UNITED STATES MAGISTRATE JUDGE

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